IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF SOUTH CAROLINA

CHARLESTON DIVISION

UNITED STATES OF AMERICA, Plaintiff, -versus- RICHARD GREGORY ZAHN, Defendant.	)	CRIMINAL NUMBER: 3:13-CR-00092 MOTION REQUESTING EARLY TERMINATION OF PROBATION

The Defendant, Richard Gregory Zahn, respectfully requests the Court consider the termination of his probation.

On November 30, 2015, the Court sentenced Mr. Zahn to a period of supervised release of three years. Since the commencement of Mr. Zahn's period of supervision in December of 2015, he has been fully compliant with all of the conditions of his probation.

Title 18 United States Code Section 3564(c) provides that:

> The court, after considering factors set forth in section 3553(a) to the extent that they are applicable, may . . . terminate a term of probation previously ordered and discharge the defendant at any time . . . after the expiration of one year of probation in the case of a felony, if it is satisfied that such action is warranted by the conduct of the defendant and the interest of justice.

Considerations contained in §3553 include, *inter alia*, the nature and circumstances of the offense and the history and characteristics of the defendant; the ability to afford adequate deterrence to criminal conduct; the need to protect the public from further crimes of the defendant; and the need to provide the defendant with needed education or vocational training, medical care, or other correctional treatment in the most effective manner. 18 U.S.C. §3553.

Mr. Zahn has no criminal history other than the Indictment in this case. These facts demonstrate the appropriateness of the requested termination of supervision.

Based upon these legal standards, Mr. Zahn respectfully requests the Court consider termination of his probation.

Respectfully submitted,

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